

Evan Frank

From: Evan Frank
Sent: Wednesday, June 23, 2021 11:57 AM
To: Trevor C. Serine, Esq.
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946
Attachments: PI Second RFPDs.pdf

Following up on below – can we confirm one of these days at the end of July?

Also, we served some discovery requests back in January, before you were involved in the case. I'm attaching them again in case you don't have them.

From: Evan Frank
Sent: Tuesday, June 15, 2021 1:51 PM
To: Trevor C. Serine, Esq. <tcs@serinelaw.com>
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

How about the last week in July, 26, 27, 28, 29, or 30?

From: Trevor C. Serine, Esq. <tcs@serinelaw.com>
Sent: Thursday, June 10, 2021 5:10 PM
To: Evan Frank <EFrank@alflaw.net>
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

Hey Evan – I won't be available that week, my wife is due to give birth July 1.

We can circle back once he is born, or you can send me a block of dates later in July?

Thanks,

Trevor C. Serine, Esq.
30 West Third Street
Media, PA 19063
Direct (Office): 484.448.6426
Mobile: 484.269.4088
Fax: 610.892.7412
<https://Serinelaw.com>

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From: Evan Frank [<mailto:EFrank@alflaw.net>]
Sent: Thursday, June 10, 2021 2:27 PM
To: Trevor C. Serine, Esq.
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

Following up on below, can you please send me available dates from June 29 to July 8? Thank you.

From: Evan Frank
Sent: Thursday, June 3, 2021 4:28 PM
To: Trevor C. Serine, Esq. <tcs@serinelaw.com>
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

Since we won't have your answer in time, we would like to move back the deposition until after it's filed. Can you please send me some available dates for you and your client for June 29 – July 8?

Thanks,
Evan

From: Evan Frank
Sent: Wednesday, May 26, 2021 1:39 PM
To: Trevor C. Serine, Esq. <tcs@serinelaw.com>
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

Here it is.
Evan

From: Trevor C. Serine, Esq. <tcs@serinelaw.com>
Sent: Wednesday, May 26, 2021 12:47 PM
To: Evan Frank <EFrank@alflaw.net>
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

Sure – see attached.

Thanks!

Trevor C. Serine, Esq.
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From: Evan Frank [<mailto:EFrank@alflaw.net>]
Sent: Wednesday, May 26, 2021 12:38 PM
To: Trevor C. Serine, Esq.
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

I didn't receive an attachment on the last e-mail. Would you please send it again?

Thanks,
Evan

From: Trevor C. Serine, Esq. <tcs@serinelaw.com>
Sent: Tuesday, May 25, 2021 5:04 PM
To: Evan Frank <EFrank@alflaw.net>; Alan Frank <afrank@alflaw.net>

Cc: 'Donna Marley' <Donna_Marley@paed.uscourts.gov>
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

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Dear Counsel,

As noted below, a short extension is necessary in order to properly prepare the Answer. To that end, It is appreciated if you would kindly execute the attached Stipulation for an Extension of Time to respond.

Feel free to contact me to discuss.

Thank you,

Trevor C. Serine, Esq.
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From: Donna Marley [mailto:Donna_Marley@paed.uscourts.gov]
Sent: Tuesday, May 25, 2021 4:43 PM
To: Trevor C. Serine, Esq.
Cc: EFrank@alflaw.net; afrank_alflaw.net
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

Thank you for your response. If all parties agree to an extension, you can prepare a stipulation and email same for the Judge's approval.

Best,

Donna Marley

From: Trevor C. Serine, Esq. <tcs@serinelaw.com>
Sent: Tuesday, May 25, 2021 4:41 PM
To: Donna Marley <Donna_Marley@paed.uscourts.gov>
Cc: EFrank@alflaw.net; afrank_alflaw.net <afrank@alflaw.net>
Subject: RE: AC2T, Inc. v. Purrington - Civil Action No. 19-5946

CAUTION - EXTERNAL

Good afternoon Ms. Marley:

We will be filing an Answer, but there have been some difficulties and delays, and I have just recently been retained and have been getting up to speed.

If Plaintiff's counsel agrees, I would request an brief extension of time to file the Answer not to exceed 30 days.

Thanks,

Trevor C. Serine, Esq.
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From: Donna Marley [mailto:Donna_Marley@paed.uscourts.gov]
Sent: Tuesday, May 25, 2021 4:27 PM
To: TCS@serinelaw.com
Cc: EFrank@alflaw.net; afrank_alflaw.net
Subject: AC2T, Inc. v. Purrington – Civil Action No. 19-5946

Good afternoon Counsel:

Will you be filing an answer to the amended complaint?

Thank you.

Donna Marley

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